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**IN THE UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

This document relates to:

All Actions

Case No.: 5:22-cv-07557-PCP (VKD)

**DECLARATION OF KATE M. BAXTER-  
KAUF IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANT META  
PLATFORM INC.'S MOTION TO  
EXCLUDE THE EXPERT REPORT AND  
TESTIMONY OF ROBERT ZEIDMAN**

Date: January 15, 2026  
Time: 10:00 a.m.  
Court: Courtroom 8, 4th Floor  
Honorable P. Casey Pitts

1 I, Kate, Baxter-Kauf, declare as follows:

2 1. I am an attorney licensed to practice in the State of Minnesota, in good standing as  
3 an active member of the Bar in the State of Minnesota, and appearing in this Court *pro hac vice*.  
4 I am a partner at the law firm Lockridge Grindal Nauen PLLP counsel of record for Plaintiffs in  
5 this case. I have personal knowledge of the facts stated below and, if called as a witness, I could  
6 and would testify competently thereto.

7 2. I submit this declaration in support of Plaintiff's Opposition to Defendant Meta  
8 Platforms, Inc.'s Motion to Exclude the Expert Report and Testimony of Robert Zeidman.

9 3. Each document is being filed under seal pursuant to the operative protective order  
10 in this case either because Meta designated cited portions as confidential or the document  
11 describes information that Meta designated as confidential.

12 4. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the deposition  
13 transcript of Robert Zeidman, who was deposed in this matter on October 3, 2025.

14 5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the deposition  
15 transcript of Georgios Zervas, Ph.D., who was deposed in this matter on December 2, 2025.

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
17 December 15, 2025, at Minneapolis, Minnesota.

18  
19 By: /s/ Kate Baxter-Kauf  
20 Kate Baxter-Kauf  
21  
22  
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**EXHIBIT A**

**REDACTED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION B

IN RE META PIXEL TAX FILING  
CASES

Case No. 5:22-cv-07557-PCP  
(VKD), All Actions

\*\*\*HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER\*\*

VIDEOTAPED DEPOSITION OF ROBERT ZEIDMAN  
Las Vegas, Nevada  
Friday, October 3, 2025  
9:36 a.m.

Reported by: Jill E. Shepherd, RPR,  
NV CCR 948  
CA CSR 13275  
MA CSR 1408608  
UT CSR 10410191-7801  
Job No. 7625547; Firm No. 053F

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1 VIDEOTAPED DEPOSITION OF ROBERT ZEIDMAN, a  
2 witness called on behalf of the Defendants, before  
3 Jill E. Shepherd, RPR, NV-CCR #948, CA-CSR #13275,  
4 at the offices of McDonald & Carano, 2300 West  
5 Sahara Avenue, Las Vegas, Nevada, on Friday,  
6 October 3, 2025, 9:36 a.m.

7  
8  
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21  
22 -- and --  
23  
24  
25  
26

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5  
6  
7  
8  
9 ALSO PRESENT:

10 Tiffany Tandingan, Videographer

11 Maksym Khomenko, expert witness (via Zoom)  
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I N D E X

WITNESS

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ROBERT ZEIDMAN

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Examination by Mr. Liskow

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NO.

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4 Deposition of Jori M. Lindley  
dated June 24, 2025

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## HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1 37, you describe different kinds of events and 10:52:14  
2 material. When you say "various kinds of data" in 10:52:24  
3 your conclusion, are you referring to what's 10:52:26  
4 described in paragraphs 36 and 37? 10:52:29

5 A. Yes. 10:52:32

6 Q. Let's go back to paragraph 57. I want to 10:52:33  
7 look at 57.2. Actually, before I get to 52, what do 10:52:39  
8 you mean by "largely uniform"? 10:52:44

9 A. Largely -- by largely uniform, I mean that 10:52:46  
10 with respect to the data -- some data is sent from 10:52:54  
11 every website that contains a Meta Pixel, and some 10:52:59  
12 data is determined by the specific tag that the tax 10:53:03  
13 preparer included on their website. But if it's the 10:53:11  
14 automatic data, it's all the same for each tax 10:53:16  
15 preparers' website. If it's some of the custom data 10:53:20  
16 or that's determined by developer of the tax 10:53:25  
17 preparer website, it's limited to data and data that 10:53:29  
18 Facebook describes how to send. So in other words, 10:53:39  
19 although it may be -- the tax preparer may choose 10:53:44  
20 which data to send, Meta describes which data can be 10:53:48  
21 sent. So it's -- there's nothing that's allowed 10:53:51  
22 differently from each website. And that's what I 10:53:56  
23 mean by done in a uniform manner. 10:53:59

24 Q. I just want to break that down a little 10:54:01  
25 bit. 10:54:03  
26

## HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1           When you say the tax preparer may choose           10:54:03  
2       which data to send, but Meta describes the data that   10:54:07  
3       can be sent, does that mean, in your understanding,   10:54:11  
4       that there's a list of kinds of data that can be       10:54:15  
5       sent and everything falls into those categories?       10:54:21

6           A.   Well, if we look at the earlier paragraph     10:54:25  
7       you pointed me to, which was --                       10:54:28

8           Q.   37, I believe?                               10:54:34

9           A.   Actually, I'm thinking of 36.               10:54:39

10          Q.   Okay.                                       10:54:42

11          A.   There are three kinds of events, which       10:54:43  
12       represent three kinds of data that Meta specifies     10:54:45  
13       can be sent to Meta through a Meta Pixel. And by       10:54:51  
14       uniform, I mean that although each website may have   10:54:58  
15       some different data, they do it in a manner that's     10:55:02  
16       described by Meta. So standard events are a list of    10:55:05  
17       events that the user can choose to send to Meta.       10:55:11  
18       That means that specific data that the -- sorry,       10:55:16  
19       that the tax preparer site could choose to send to     10:55:21  
20       Meta.   10:55:24

21               The custom events are other data that Meta     10:55:25  
22       explains how to send, but is up to the tax preparer    10:55:31  
23       itself or the developers of the tax preparer site to    10:55:35  
24       send. And then automatic events are sent regardless     10:55:39  
25       of what the developer does. So those or defined       10:55:42

26

1 specifically by Meta. And again, by events, that 10:55:45  
2 really means the kind of data that's sent. 10:55:49  
3 Q. And so in your definition, custom events 10:55:54  
4 are still uniform even though they are defined by 10:55:59  
5 the client's -- or by the operator, the tax preparer 10:56:03  
6 website, because there is a description from Meta on 10:56:10  
7 how to set up a custom event? 10:56:15  
8 A. Correct. 10:56:17  
9 Q. Let's go back to paragraph 57. 10:56:18  
10 Let's look at 57.2. 10:56:21  
11 You looked at samples of visitor data from 10:56:26  
12 the tax preparer's website that Meta produced to 10:56:29  
13 plaintiffs from its repository of Hive data. 10:56:33  
14 And when you say "samples," are those 10:56:38  
15 specific samples listed on your Exhibit A? 10:56:43  
16 A. Yes. 10:56:51  
17 Q. And what are they listed as? 10:56:52  
18 A. That's number 1, the data produced by Meta 10:56:54  
19 to plaintiff's, including event data sample and 10:56:58  
20 representative data. 10:57:02  
21 Q. And your next sentence is: "I determined 10:57:07  
22 that the data included 'pen register' data -- and 10:57:10  
23 pen register is quotes -- that was transmitted from 10:57:14  
24 each visit to the tax preparer's website to Meta as 10:57:17  
25 well as other data reflecting visitors' tax 10:57:22  
26

1 Q. Sure. It's near the bottom of 57, 11:16:54  
2 paragraph 2. 11:16:56  
3 A. Oh. Two. Okay. 11:16:56  
4 Q. Yes. This is the paragraph we were just 11:16:58  
5 looking at about pen register. You say, 11:16:59  
6 "transcended pen register data as well as" -- and 11:17:05  
7 it's about halfway through the paragraph -- "other 11:17:06  
8 data reflecting visitors' tax information and other 11:17:09  
9 financial concerns." 11:17:11  
10 A. And your question is what other financial 11:17:13  
11 concerns? 11:17:18  
12 Q. What data -- what's in this category, 11:17:18  
13 "reflecting visitors' tax information and other 11:17:21  
14 financial concerns." I can break it up if you want. 11:17:27  
15 What is visitors' tax information? 11:17:29  
16 A. So I have examples in paragraph 46. 11:17:32  
17 Q. Okay. Go ahead. 11:17:47  
18 A. This is information that Meta confirmed was 11:17:57  
19 being sent through the Meta Pixel, and there's a 11:18:00  
20 list of information there including e-mails, 11:18:05  
21 [REDACTED] 11:18:12  
22 [REDACTED] 11:18:16  
23 Q. Okay. So which items in paragraph 46 11:18:20  
24 constitute tax information? 11:18:23  
25 A. I'm not certain which each individual 11:18:24  
26

## HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1 data -- piece of data represents, but my 11:18:32  
2 understanding -- and I'm not an accountant, but my 11:18:37  
3 [REDACTED] 11:18:42  
4 [REDACTED] 11:18:51  
5 [REDACTED] 11:18:55  
6 [REDACTED] [REDACTED] 11:19:00  
7 [REDACTED] [REDACTED] 11:19:02  
8 [REDACTED] [REDACTED] 11:19:04  
9 [REDACTED] [REDACTED] [REDACTED] 11:19:11  
10 those, I believe are -- in my understanding, are 11:19:20  
11 tax-related information. There's also in paragraph 11:19:25  
12 47 I list other information that Meta admitted was 11:19:35  
13 [REDACTED] 11:19:40  
14 [REDACTED] [REDACTED] 11:19:47  
15 [REDACTED] [REDACTED] 11:19:53  
16 [REDACTED]. 11:19:58  
17 Q. Okay. 11:20:02  
18 So did you do any independent work to 11:20:03  
19 determine what each of these categories means? 11:20:07  
20 A. Well, I can -- I believe that Meta 11:20:14  
21 confirmed, and I have that in Exhibit M in the 11:20:18  
22 responses and Exhibit N in responses, and also in 11:20:22  
23 paragraph 49 there is an event data sample that Meta 11:20:27  
24 [REDACTED] 11:20:34  
25 [REDACTED] 11:20:37  
26

1 the case? 11:23:38

2 A. I found this data in the Hive data that I 11:23:38

3 was provided. 11:23:45

4 Q. But did you do anything to quantify it? 11:23:45

5 MR. LISKOW: Objection. Vague. 11:23:48

6 THE WITNESS: With regard to how often? 11:23:49

7 Not that I recall, but I can do that. I do have 11:23:52

8 some quantification about the number of visits. 11:23:57

9 BY MS. STEBBINS BINA: 11:23:57

10 Q. Well I'd like to go back to paragraph 57.2. 11:24:00

11 You state there that there was, quote: "An enormous 11:24:04

12 amount of tax information and other data 11:24:09

13 transmitted." 11:24:12

14 Is that correct? 11:24:14

15 A. Yes. 11:24:15

16 Q. What is your basis for determining that it 11:24:18

17 was an enormous amount of tax information and other 11:24:22

18 data? 11:24:25

19 A. Well, enormous is, of course, a 11:24:26

20 non-technical term, it's not a quantifiable or 11:24:29

21 quantity; however, the -- the spreadsheets that I 11:24:34

22 received as a sample of data from Meta was, when put 11:24:42

23 into a database, created a database that was as I 11:24:49

24 recall, [REDACTED] over a limited period 11:24:52

25 of time. And it was so much that I had to get a -- 11:24:55

26

1 one of the top end solid state drives. And as a 11:25:03  
2 spreadsheet, it was virtually unusable because the 11:25:13  
3 spreadsheet program Excel could not open it -- any 11:25:16  
4 one of these, and there were, I believe, [REDACTED] 11:25:21  
5 So Excel had difficulty opening one of them, and 11:25:26  
6 putting it into a database took a while to search. 11:25:30  
7 So I think although [REDACTED] 11:25:34  
8 term, it just meant that there was a very large 11:25:38  
9 amount of data by any standard that I'm used to. 11:25:43  
10 Q. Is it your testimony that every event in 11:25:46  
11 that database included fields similar to those 11:25:50  
12 described in paragraphs 46, 47, and 49 of your 11:25:55  
13 report? 11:26:00  
14 A. Not every one, but when I wrote a script to 11:26:00  
15 find the data, there was a very large amount of it. 11:26:11  
16 I don't recall the exact number. 11:26:14  
17 Q. Do you have any sense of whether it was 11:26:16  
18 more or less than half of the entries? 11:26:18  
19 A. I don't recall. 11:26:20  
20 Q. More or less than 10 percent of the 11:26:22  
21 entries? 11:26:26  
22 MR. LISKOW: Objection. Asked and 11:26:26  
23 answered. 11:26:27  
24 THE WITNESS: I don't recall. One issue 11:26:27  
25 that I run into as with any database program that 11:26:30  
26



1 [REDACTED] 11:30:45  
2 [REDACTED] 11:30:49  
3 A. I think [REDACTED] 11:30:49  
4 [REDACTED] 11:30:54  
5 I talk about in Section D of my report, starting 11:30:59  
6 with paragraph 51, how I proposed doing that. 11:31:02  
7 Q. So the last sentence of 57.2, is supported 11:31:08  
8 by Section D of your report? 11:31:13  
9 A. Yes. 11:31:15  
10 Q. We'll come back to that then. 11:31:16  
11 A. Sure, let me just clarify that. It's 11:31:20  
12 specifically Section 5(D). 11:31:22  
13 Q. Did you do anything to determine that the 11:31:26  
14 transmission -- that the materials that the tax 11:31:33  
15 preparers chose to send to Meta via the Meta Pixel, 11:31:39  
16 was uniform over the proposed class periods? 11:31:43  
17 A. Well, I looked at the documentation that 11:31:46  
18 Meta provided about how to do it, so in the sense 11:31:54  
19 that Meta provided rules that at least is one 11:31:58  
20 understanding of uniformity, but I also did search 11:32:05  
21 through these enormous -- let's say through the 11:32:09  
22 enormous database and pulled up some of these 11:32:15  
23 spreadsheets to look at them directly in Excel, 11:32:20  
24 which took a really long time, actually, sometimes 11:32:24  
25 in Notepad++ -- that's a product, Notepad++, to 11:32:29  
26

1 visually confirm it. I don't recall if I did, for 11:32:39  
2 example, run a script to examine any of the data or 11:32:43  
3 its -- how often any particular item of data was 11:32:47  
4 transmitted. 11:32:51

5 Q. What time period did the event data sample 11:32:52  
6 and representative data cover? 11:32:56

7 A. So my understanding of the event data 11:32:58  
8 sample was data from the [REDACTED] 11:33:22  
9 [REDACTED] between April 2022, and April 2023. 11:33:31

10 Q. The proposed classes in this period cover a 11:33:38  
11 somewhat broader time period than that, correct? 11:33:44

12 A. Yes. 11:33:47

13 Q. Did you look at any documentation from the 11:33:47  
14 earlier periods or later periods to determine 11:33:54  
15 whether or not the pixel functioned in the same way 11:33:58  
16 at those earlier or later times? 11:34:00

17 A. So if I understand your question, you are 11:34:03  
18 asking me if the Meta Pixel functioned in the same 11:34:07  
19 way between those times? 11:34:12

20 Q. Or your testimony is that the Meta Pixel 11:34:13  
21 collected and transmitted various types of data to 11:34:17  
22 Meta during the relevant class periods and doing so 11:34:20  
23 in a largely uniform manner on each website during 11:34:23  
24 the relevant class periods. 11:34:26

25 And so I'm asking: What did you do to 11:34:28  
26

## HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1 Q. So if there is a way to turn off automatic 11:50:31  
2 configuration in the current Meta pixel, would that 11:50:34  
3 affect your opinion that the data was absolutely 11:50:39  
4 transmitted in a uniform manner across the proposed 11:50:41  
5 class periods? 11:50:45

6 MR. LISKOW: Objection. Vague. 11:50:45

7 THE WITNESS: I still think it's uniform in 11:50:47  
8 that each visitor to each tax preparer's website 11:50:50  
9 sent the same type of information contingent on 11:50:57  
10 their actions at the website and that it was 11:51:01  
11 controlled by what Meta allowed. 11:51:03

12 BY MS. STEBBINS BINA: 11:51:03

13 Q. But isn't the issue in this case about 11:51:10  
14 whether or not personal or confidential tax 11:51:13  
15 information was transmitted? 11:51:16

16 MR. LISKOW: Objection. Calls for a legal 11:51:18  
17 conclusion. 11:51:19

18 BY MS. STEBBINS BINA: 11:51:19

19 Q. I'm just asking for your understanding of 11:51:21  
20 the case? 11:51:23

21 MR. LISKOW: Objection. Call for a legal 11:51:23  
22 conclusion. 11:51:25

23 BY MS. STEBBINS BINA: 11:51:25

24 Q. You can still answer. 11:51:25

25 A. That's my understanding and whether some of 11:51:27  
26

## HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1 Q. And you are not providing any opinions with 11:55:52  
2 respect to TaxSlayer, correct? 11:55:54

3 A. That's correct. 11:55:56

4 Q. This document itself does not state that 11:55:57  
5 the pixel operated in uniform manner over those 11:56:02  
6 periods, correct? 11:56:05

7 A. It does not specifically state that, no. 11:56:06

8 Q. And then we looked also at Exhibits 7, 8, 11:56:18  
9 and 9, all of which were printed in August 2025, 11:56:25  
10 correct? 11:56:32

11 A. That's correct. 11:56:32

12 Q. And, at least, as we sit here today, none 11:56:33  
13 of these three printed documents demonstrate that it 11:56:36  
14 could be operated in a uniform manner over the 11:56:40  
15 proposed class periods, right? 11:56:43

16 A. It's my understanding that that is the 11:56:45  
17 case, but these documents do not specifically state 11:56:48  
18 that. 11:56:50

19 Q. Is there anything else in your materials 11:56:51  
20 relied upon that you believe does state that? 11:56:54

21 A. Well, again, I believe it is the data, at 11:57:30  
22 least, the data produced by Meta. The event data 11:57:33  
23 sample and the representative data, my analysis 11:57:37  
24 shows that it's uniform again in that this data was 11:57:41  
25 transmitted during the period and that it was 11:57:45

26

1 controlled by Meta in the rules that Meta set. 11:57:49

2 Q. In 2022 and 2023? 11:57:53

3 A. Yes. That's correct. 11:57:55

4 Q. Even though during that time period, there 11:57:58

5 were [REDACTED]? 11:58:00

6 A. I can't confirm that. I would need to go 11:58:05

7 and confirm that. 11:58:07

8 Q. Anything else on Exhibit A that you are 11:58:08

9 relying on for your opinion that the Meta Pixel 11:58:11

10 operated in a uniform manner over the proposed class 11:58:15

11 periods? And I'm looking specifically with respect 11:58:19

12 to time here. 11:58:21

13 A. I don't think we've looked at Exhibit L and 11:58:23

14 I would need to refresh my memory about what's in 11:58:30

15 that. 11:58:32

16 Q. Sure. 11:58:33

17 MS. STEBBINS BINA: Let's mark that as 11:58:34

18 Exhibit 12. 11:58:36

19 (Exhibit 12 marked.) 11:58:38

20 THE WITNESS: And I'm not sure we looked at 11:58:38

21 Exhibit E. 11:59:04

22 MS. STEBBINS BINA: You can grab that one 11:59:09

23 too and mark it as 13. 11:59:11

24 (Exhibit 13 marked.) 11:59:11

25 THE WITNESS: There's also information in 11:59:23

26

1 provide the opinions you were asked to provide in 13:21:13  
2 this case? 13:21:15

3 MR. LISKOW: I want to object generally to 13:21:16  
4 this line of questioning, only in the narrow sense 13:21:19  
5 of the extent that the answers to these types of 13:21:22  
6 questions require discussion of our -- your 13:21:25  
7 communications with us as counsel, but are not facts 13:21:28  
8 or assumptions we provided to you, I will caution 13:21:32  
9 you to avoid those. But, otherwise. 13:21:35

10 BY MS. STEBBINS BINA: 13:21:39

11 Q. I'm just asking what you did to determine 13:21:39  
12 what you needed to rely on. If the answer is, you 13:21:44  
13 know, you provided documents by counsel and asked to 13:21:47  
14 use those as your basis for your report, that's 13:21:50  
15 fine. I'm just wondering if you, you know, if you 13:21:52  
16 did anything additional or further or kind of how 13:21:54  
17 you went through that process. 13:21:56

18 A. Well, the process was that I was given 13:21:58  
19 documents that counsel thought would be relevant to 13:22:02  
20 my opinions. And then as I developed my opinions 13:22:05  
21 and did my analysis, I requested documents saying, I 13:22:09  
22 need to understand this issue or, you know, is there 13:22:13  
23 any testimony about this particular fact. And then 13:22:17  
24 if there was, I was supplied with those documents. 13:22:21  
25 And this was an ongoing process of back and forth. 13:22:26

26

1 page and says, you know, "Do you want to accept 13:34:17  
2 cookies? Do you want to allow data sharing?" Or 13:34:22  
3 "Don't sell or share my information," is how they 13:34:25  
4 are often presented? 13:34:28  
5 A. That's my understanding. 13:34:29  
6 Q. And if a consent banner is implemented on a 13:34:30  
7 website or a web page, that could change the Meta 13:34:35  
8 Pixel's functionality, right? 13:34:39  
9 MR. LISKOW: Objection. Vague. 13:34:41  
10 THE WITNESS: That could, yes. 13:34:43  
11 BY MS. STEBBINS BINA: 13:34:45  
12 Q. Do you know whether or not H&R Block or 13:34:45  
13 TaxAct ever instituted any kind of operator 13:34:53  
14 consent -- operator consents with respect to the 13:34:57  
15 installation of the Meta Pixel or operation of the 13:35:01  
16 Meta Pixel? 13:35:04  
17 MR. LISKOW: Objection. Vague. 13:35:04  
18 THE WITNESS: Are you referring to the 13:35:05  
19 banner we were just discussing? 13:35:08  
20 BY MS. STEBBINS BINA: 13:35:08  
21 Q. Something like a banner, yes. Anything 13:35:09  
22 along those lines. 13:35:12  
23 MR. LISKOW: Same objection. 13:35:12  
24 THE WITNESS: I'm not aware if they did or 13:35:14  
25 didn't implement something like that. 13:35:16  
26

1 BY MS. STEBBINS BINA: 13:35:16

2 Q. If they did, in fact, implement something 13:35:18

3 like that for some portion of their users, would 13:35:20

4 that impact your opinion as to whether the sites 13:35:23

5 operated -- the pixel operated in a uniform manner? 13:35:27

6 MR. LISKOW: Same objection. 13:35:30

7 THE WITNESS: From what I saw on the data, 13:35:30

8 it was uniform, so I don't know what was 13:35:34

9 implemented, but as I use the term as I saw in the 13:35:37

10 data, it was uniform. 13:35:41

11 BY MS. STEBBINS BINA: 13:35:41

12 Q. But if it were not uniform, I'm going to 13:35:43

13 ask you to assume that it was not uniform and that, 13:35:46

14 in fact, they operated in some portions, would that 13:35:48

15 impact your opinion? 13:35:54

16 MR. LISKOW: Objection. Misstates 13:35:55

17 testimony and vague. 13:35:57

18 THE WITNESS: I think I need to think about 13:35:57

19 it because I need to -- I think we would need to 13:35:59

20 come to a, perhaps, more detailed understanding of 13:36:02

21 what we meant by uniform. 13:36:05

22 BY MS. STEBBINS BINA: 13:36:06

23 Q. But uniform is in your opinions, so I think 13:36:08

24 it's certainly helpful and important to clarify what 13:36:12

25 you mean by uniform. 13:36:14

26



1 A. I do know that. 13:41:43

2 Q. Would the fact that some users used such 13:41:44

3 private browsing modes impact your opinion as to 13:41:52

4 whether or not the Pixel operated in a substantially 13:41:54

5 uniform manner? 13:41:58

6 A. I don't believe so. 13:41:59

7 Q. What about the VPNs? Do you understand 13:42:00

8 that when I say "VPN," I mean virtual private 13:42:05

9 network? 13:42:08

10 A. Yes. 13:42:08

11 Q. I'm sort of giving you background. 13:42:09

12 A VPN will mask a user's IP address, right, 13:42:12

13 such that the user's real IP address is typically 13:42:17

14 not transmitted? 13:42:21

15 A. That's correct. 13:42:21

16 Q. So, for example, if I use a VPN from 13:42:22

17 California, I might show up as being in Europe 13:42:26

18 somewhere? 13:42:28

19 A. That's correct. 13:42:29

20 Q. Your report does not analyze anything about 13:42:30

21 how Meta matches data to users, right? 13:42:47

22 A. That's correct. 13:42:51

23 Q. Do you have any technical understanding of 13:42:51

24 what Meta does or doesn't do to match data? 13:42:56

25 A. I have a general understanding about 13:42:59

26

## HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1 and [REDACTED] 14:07:02

2 [REDACTED] 14:07:06

3 [REDACTED], end quote. Right? 14:07:09

4 A. Yes. 14:07:12

5 Q. Do you understand what "[REDACTED]" 14:07:13

6 [REDACTED] " means here? 14:07:18

7 A. Sorry. Could you repeat the question? 14:07:20

8 Q. Sure. Do you understand what "[REDACTED]" 14:07:27

9 [REDACTED] " means here? 14:07:29

10 A. Yes. So my understanding is that there was 14:07:31

11 [REDACTED] 14:07:35

12 [REDACTED] 14:07:41

13 [REDACTED]. 14:07:45

14 Q. So your testimony, I think, is that there 14:07:48

15 was an [REDACTED] 14:07:53

16 [REDACTED] 14:07:58

17 [REDACTED] [REDACTED] 14:08:01

18 [REDACTED] 14:08:04

19 [REDACTED] 14:08:07

20 correct? 14:08:09

21 A. Yes. 14:08:10

22 Q. What is an IP address? 14:08:10

23 A. Everything -- well, it's an Internet 14:08:14

24 protocol address, and everything connected to the 14:08:19

25 Internet has to have a distinct address. It's a 14:08:22

26

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1 THE VIDEOGRAPHER: This concludes today's 15:36:27  
2 deposition of Robert Zeidman. We are now going off 15:36:29  
3 the record at 3:36 p.m. 15:36:32

4 (Whereby the proceedings were adjourned at 15:36:36  
5 3:36 p.m.)

6 \* \* \* \* \*

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REPORTER'S CERTIFICATE

STATE OF NEVADA )

) ss

COUNTY OF CLARK )

I, JILL E. SHEPHERD, CA-CSR 13275;  
NV-CSR 948, RPR, do hereby certify:

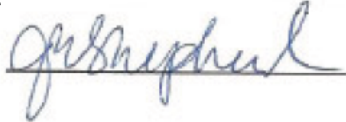
That I reported the taking of the  
deposition of ROBERT ZEIDMAN commencing on  
October 3, 2025, at the hour of 9:36 a.m.

That prior to being examined, the  
witness was by me duly sworn to testify to the  
truth, the whole truth, and nothing but the truth:

That I thereafter transcribed my  
said shorthand notes into typewriting, and that the  
typewritten transcript of said deposition is a  
complete, true, and accurate transcription of my  
said shorthand notes taken down at said time.

I further certify that (1) I am not  
a relative, employee or independent contractor of  
counsel of any of the parties; nor a relative,  
employee or independent contractor of the parties  
involved in said action; nor a person financially  
interested in the action; nor do I have any other  
relationship with any of the parties or with counsel  
of any of the parties involved in the action that  
may reasonably cause my impartiality to be  
questioned; and (2) that a request has been made to  
review the transcript.

IN WITNESS WHEREOF, I have hereunto  
set my hand and affixed my official seal of office  
in the County of Clark, State of Nevada, this 10th  
day of October 2025



Jill E. Shepherd, RPR  
NV CCR 948  
CA CSR 13275  
MA CSR 1408608  
UT-CSR 10410191-7801

Jessica Stebbins Bina, Esq.

jessica.stebbinsbina@lw.com

October 10, 2025

RE: In Re Meta Pixal Filing Cases v.

10/3/2025, Robert Zeidman, (#7625547).

The above-referenced transcript has been

completed by Veritext Legal Solutions and

review of the transcript is being handled as follows:

\_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext to schedule a time to review the original transcript at a Veritext office.

\_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF Transcript - The witness should review the transcript and make any necessary corrections on the errata pages included below, notating the page and line number of the corrections. The witness should then sign and date the errata and penalty of perjury pages and return the completed pages to all appearing counsel within the period of time determined at the deposition or provided by the Code of Civil Procedure. Contact Veritext when the sealed original is required.

\_\_\_ Waiving the CA Code of Civil Procedure per Stipulation of Counsel - Original transcript to be released for signature as determined at the deposition.

\_\_\_ Signature Waived - Reading & Signature was waived at the time of the deposition.

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1       \_\_\_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF  
2       Transcript - The witness should review the transcript and  
3       make any necessary corrections on the errata pages included  
4       below, notating the page and line number of the corrections.  
5       The witness should then sign and date the errata and penalty  
6       of perjury pages and return the completed pages to all  
7       appearing counsel within the period of time determined at  
8       the deposition or provided by the Federal Rules.  
9       \_X\_ Federal R&S Not Requested - Reading & Signature was not  
10      requested before the completion of the deposition.

**EXHIBIT B**

**FILED UNDER  
SEAL**